

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	CRIMINAL NO. 19-888
)	
v.)	
)	
JUAN ROJAS HERNANDEZ,)	
)	
Defendant.)	
)	

**MODIFICATION OF BAIL CONDITIONS ALLOWING DEFENDANT TO STAY AT
HOSPITAL WITH GIRLFRIEND DURING CHILDBIRTH, AND RECOVERY PERIOD**

COMES NOW the defendant, Juan Rojas Hernandez, by and through his undersigned counsel, Howard Brownstein, Esq., and with no objection from Anthony Torntore, Assistant U.S. Attorney for the District of New Jersey, and no objection from Andrew Dziopa, U.S. Pre-trial Services Officer, District of New Jersey, states as follows:

1. Defendant, Juan Rojas Hernandez was arrested on November 5, 2019 on a criminal complaint. The Government moved to detain Mr. Rojas Hernandez on February 21, 2020 a formal detention hearing took place before United States Magistrate Judge James B. Clark, III.

2. On December 22, 2020, based on a Consent Order executed by Chief Magistrate Judge Mark Falk, the Defendant was released on a \$100,000.00 unsecured appearance bond, under home confinement and subject to location monitoring and ankle bracelet.

3. On April 22, 2021, the defendant entered a guilty plea with the Court.

4. The defendant's girlfriend is due to give birth to Mr. Rojas' baby on or about July 22, 2022 at the Jersey City Medical Center, located at 355 Grand Street, Jersey City, New Jersey 07302.

5. With no objection from all parties, the defendant, Juan Rojas Hernandez, respectfully requests the conditions of bail be modified allowing him to stay with his girlfriend, Maria Rodriguez, at the hospital during childbirth and the recovery period, which is usually around 3 days, under supervision from U.S. Pre-Trial Services, District of New Jersey. Stationary location to be verifiable and monitored by Pre-Trial Services.

6. All other conditions of bail shall remain the same.

Respectfully Submitted,
BROWNSTEIN & ASSOCIATES, P.C.

By: /s/Howard B. Brownstein
HOWARD B. BROWNSTEIN

Dated: July 15, 2022

**UNITED STATES DISTRICT COURT
DISTRICT OF NEW JERSEY**

UNITED STATES OF AMERICA,)	
)	
v.)	ORDER
)	
JUAN ROJAS HERNANDEZ,)	CR. NO.: 19-888
)	
Defendant.)	
)	

THIS CASE came before the Court on an application to modify conditions of bail, allowing the defendant, Juan Rojas Hernandez, to accept employment. The Court having reviewed the pertinent information and being duly advised, it is hereby,

ORDERED and ADJUDGED that the application to modify conditions of bail, permitting the defendant to stay with his girlfriend at the hospital during childbirth and the recovery period, which is usually 3 days, is hereby _____; and it is further

ORDERED and ADJUDGED that defendant will be monitored by U.S. Pre-trial Services, District of New Jersey; and.

IT IS further ORDERED that all other conditions of bail shall remain the same.

DONE AND ORDERED in Chambers at the United States District Courthouse in the District of New Jersey, this _____ day of July 2022.
